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Attorneys for Plaintiff
DAVID CANNON

UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

DAVID CANNON,)	Case No. C 07 05400 VRW
)	
Plaintiff,)	JOINT RULE 26 REPORT
)	
v.)	Date: February 14, 2008
)	Time: 3:30 p.m.
NEW UNITED MOTOR MANUFACTURING,)	Judge: Hon. Vaughn R. Walker
INC., GENERAL MOTORS, TOYOTA)	Ctrm: 6, 17th Floor
MANUFACTURING, AND DOES 1-50)	
)	
Defendants.)	

The parties to this action jointly submit the following discovery report pursuant to Rule 26(f):

1. INITIAL DISCLOSURES

No formal discovery has been conducted to date. Defendant intends to exchange Initial Disclosures pursuant to Civil local and federal rules.

2. DISCOVERY PLAN

Plaintiff anticipates the following discovery will be conducted in this matter:

1 interrogatories and production of documents. After identifying individuals who can verify
2 plaintiff's contentions, depositions will be set and conducted.

3 Defendant presently anticipates that discovery will be conducted in the following
4 manner:

5 Defendant will take Plaintiff's deposition. Defendant believes that it will need two
6 seven-hour days of actual deposition time to complete Plaintiff's deposition. In exchange,
7 Defendant is willing to produce one of its witnesses for a two-day deposition. Prior to Plaintiff's
8 deposition, Defendant will serve a request for production of documents and special
9 interrogatories, relating to Plaintiff's medical history and records. Defendant may conduct
10 additional written discovery. Defendant will conduct additional depositions as necessary. If the
11 circumstances warrant, Defendant anticipates that it will conduct one or more independent
12 medical examinations to evaluate any emotional distress claimed by Plaintiff.

13 Other than as described above, Defendant does not propose any limitation on, or change
14 in, the number of discovery requests or the duration of discovery, other than what the federal and
15 local rules already provide. Defendant does not propose any limitation on the subject matter of
16 discovery, other than what the federal and local rules already provide.

17 Defendant may designate an expert as necessary, and may determine to depose Plaintiff's
18 experts, if any. Defendant requests that the Court consider setting deadlines for experts relating
19 to damage issues after the time at which dispositive motions would be decided, so that the parties
20 can avoid the expense of damage experts if the case is disposed of via motion practice.

21 With respect to discovery motions, the parties will attempt to resolve disputes informally
22 pursuant to Federal Rules of Civil Procedure, Rule 37 and Northern District Local Rule 37-1(a).

23 **3. LIMITATIONS ON DISCOVERY**

24 Defendant estimates neither the number of depositions nor time required for each
25 deposition will exceed those time limits as set forth in Federal Rules of Civil Procedure, Rule 30,
26 with the possible exception of Plaintiff and one defense witness, in which case, the deposition
27 will not exceed fourteen hours. In addition, documents may be subpoenaed from third parties.

28 Defendant does not request at this time any changes with regard to the limitations on

1 discovery imposed by the Federal Rules of Civil Procedure nor by local rules, with the possible
2 exception of the length of one deposition on each side, which depositions shall not exceed
3 fourteen hours.


4 While plaintiff anticipate needed to conduct up to five depositions, he does not anticipate
5 that the total hours of depositions will exceed 15 hours.

6 **4. COURT ORDERS**

7 Defendant does not believe that any orders should be entered by the Court regarding
8 discovery at this time. Plaintiff does not seek any court orders at this time.

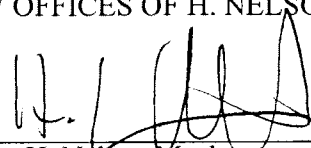
9
10
11
12 DATED: *February 7*
13 ~~January~~ 7, 2008

SEYFARTH SHAW LLP

14
15 By 
16 Christian J. Rowley
17 Althea V. Bovell
18 Attorneys for Defendant
19 NEW UNITED MOTOR
20 MANUFACTURING, INC.

21 DATED: January 31, 2008

LAW OFFICES OF H. NELSON MEEKS

22
23 By 
24 H. Nelson Meeks

25 Attorneys for Plaintiff
26 DAVID CANNON
27
28